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10
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12 Loan SPE, LLC

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **LOS ANGELES DIVISION**

12 In re
13 SEATON INVESTMENTS, LLC, *et al.*,
14 Debtors and Debtors-in-
15 Possession.
16
17 Affects:
18 All Debtors
19 Seaton Investments, LLC (*Dismissed*)
20 Colyton Investments, LLC (*Dismissed*)
21 Broadway Avenue Investments, LLC
22 SLA Investments, LLC
23 Negev Investments, LLC
24 Alan Gomperts
25 Daniel Halevy
26 Susan Halevy

Lead Case No. 2:24-bk-12079-VZ
Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and
2:24-bk-12076-VZ

Chapter 11

**ARCHWAY BROADWAY LOAN SPE,
LLC'S LIMITED OBJECTION TO
MOTION TO APPROVE SETTLEMENT
AGREEMENT WITH ARCHWAY
BROADWAY LOAN SPE, LLC UNDER
RULE 9019 OF THE FEDERAL RULES
OF BANKRUPTCY PROCEDURE**

Date: August 19, 2025
Time: 11:00 a.m.
Crtrm.: 1368
255 E. Temple Street
Los Angeles, CA 90012

Hon. Vincent P. Zurzolo

1 **LIMITED OBJECTION¹**

2 Archway has reviewed the 9019 Motion filed by the Remaining Debtors, and it generally
3 describes the contours of the Parties' settlement discussions up to this point. But the Parties have
4 not yet completed the settlement documentation.

5 That process is progressing, but it is still ongoing.

6 Unless and until the Parties finalize (i.e., draft, fully-execute, and deliver) the Settlement
7 Agreement and ancillary documents, there will be no settlement to approve.

8 If there is no such finalized Settlement Agreement by the time of the hearing, or if the
9 Court believes that further notice of the finalized documents should be provided, the Court should
10 continue the hearing to allow additional time to finalize and/or provide additional notice.

11 DATED: August 5, 2025

FRANDZEL ROBINS BLOOM & CSATO, L.C.

12 By: /s/ Gerrick M. Warrington

13 GERRICK M. WARRINGTON

14 Attorneys for Archway Broadway Loan SPE, LLC

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22 ¹ Archway Broadway Loan SPE, LLC, a Delaware limited liability company, successor in
23 interest to Archway Real Estate Income Fund I REIT, LLC ("Archway"), submits this Limited
24 Objection ("Limited Objection") to the Motion to Approve Settlement Agreement Under Rule
25 9019 of the Federal Rules of Bankruptcy Procedure ("9019 Motion") (Dkt. 527) filed in the lead
26 case of those jointly-administered debtors, Seaton Investments, LLC ("Seaton"), Colyton
27 Investments, LLC ("Colyton"), Broadway Avenue Investments, LLC ("Broadway"), SLA
28 Investments, LLC ("SLA"), and Negev Investments, LLC ("Negev" and collectively with Seaton,
Colyton, Broadway and SLA, the "Corporate Debtors") and Alan Gomperts ("Mr. Gomperts"),
Daniel Halevy ("Mr. Halevy"), and Susan Halevy ("Ms. Halevy" and collectively with
Mr. Gomperts and Mr. Halevy, the "Individual Debtors" and collectively with the Corporate
Debtors, the "Debtors" and excluding Seaton and Colyton, the "Remaining Debtors").

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1000 Wilshire Boulevard, Nineteenth Floor, Los Angeles, CA 90017-2427.

A true and correct copy of the foregoing document entitled (*specify*):

ARCHWAY BROADWAY LOAN SPE, LLC'S LIMITED OBJECTION TO MOTION TO APPROVE SETTLEMENT AGREEMENT WITH ARCHWAY BROADWAY LOAN SPE, LLC UNDER RULE 9019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) August 5, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Counsel to Party in Interest: Scott R Albrecht salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
- Counsel to KDM: Tanya Behnam tbehnam@polsinelli.com, tanyabehnam@gmail.com;ccripe@polsinelli.com;ladocketing@polsinelli.com
- Counsel to Party in Interest: Jacquelyn H Choi jacquelyn.choi@rimonlaw.com, docketingsupport@rimonlaw.com
- Counsel to Individual Debtors: Carol Chow Carol.Chow@saul.com, easter.santamaria@saul.com
- Counsel to Party in Interest: Robert F Conte robert.conte@usdoj.gov, caseview.ecf@usdoj.gov;usacac.tax@usdoj.gov
- Counsel to Individual Debtors: Ryan Coy ryan.coy@saul.com, hannah.richmond@saul.com
- Counsel to Party in Interest: Christopher Cramer secured@becket-lee.com
- Counsel to Individual Debtors: Turner Falk turner.falk@saul.com, tnfalk@recap.email
- Counsel to Archway: Michael G Fletcher mfletcher@frandzel.com, sking@frandzel.com
- Counsel to Party in Interest: Todd S. Garan ch11ecf@aldridgepite.com, TSG@ecf.inforuptcy.com;tgaran@aldridgepite.com
- Counsel to Party in Interest: Richard Girgado rgirgado@counsel.lacounty.gov
- Counsel to Party in Interest: Jacqueline L James jjames@hrhllaw.com
- Trial Counsel to U.S. Trustee: Kelly L Morrison kelly.l.morrison@usdoj.gov
- Counsel to Party in Interest: Avi Edward Muhtar amuhtar@crownandstonelaw.com
- Counsel to Archway: Bruce D Poltrack bpoltrock@frandzel.com, achase@frandzel.com
- Counsel to Individual Debtors: Zev Shechtman Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;hannah.richmond@saul.com
- Counsel to Corporate Debtors: Derrick Talerico dtalerico@wztslaw.com, maraki@wztslaw.com,sfritz@wztslaw.com,admin@wztslaw.com
- United States Trustee (LA) ustpreregion16.la.ecf@usdoj.gov
- Counsel to Archway: Gerrick Warrington gwarrington@frandzel.com, achase@frandzel.com
- Counsel to Party in Interest: Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (date) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) August 5, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Overnight Delivery (Early Morning):

The Honorable Vincent P. Zurzolo
U.S. Bankruptcy Court
Roybal Federal Building
Bin outside of Suite 1360
255 E. Temple Street
Los Angeles, CA 90012-3332

Email:

Counsel to Corporate Debtors:

Derrick Talerico dtalerico@wztslaw.com

Counsel to Individual Debtors:

Zev Shechtman Zev.Shechtman@saul.com

Turner Falk turner.falk@saul.com

Ryan Coy ryan.coy@saul.com

United States Trustee:

Kelly L Morrison kelly.l.morrison@usdoj.gov

Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 5, 2025

Date

Monica Brandenberg

Printed Name

/s/ Monica Brandenberg

Signature